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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ANDREW TURESKY, derivatively on behalf  
of LAS VEGAS SANDS CORP.,

Plaintiff

v.

DR. MIRIAM ADELSON, in her capacity as  
Special Administrator of the estate of  
SHELDON G. ADELSON, PATRICK  
DUMONT, ROBERT G. GOLDSTEIN,  
IRWIN CHAFETZ, MICHELINE CHAU,  
CHARLES D. FORMAN, STEVEN L.  
GERARD, GEORGE JAMIESON,  
CHARLES A. KOPPELMAN, LEWIS  
KRAMER, and DAVID F. LEVI,

Defendants

and

LAS VEGAS SANDS CORP.,

Nominal Defendant

Case No. 2:20-cv-02340-CDS-MDC

**STIPULATION AND ORDER  
(First Request)**

1 Plaintiff Andrew Turesky (“Plaintiff”), Nominal Defendant Las Vegas Sands Corp.  
 2 (“LVSC”), and Defendants Dr. Miriam Adelson, in her capacity as Special Administrator of the  
 3 estate of Sheldon G. Adelson, Patrick Dumont, Robert G. Goldstein, Irwin Chafetz, Micheline  
 4 Chau, Charles D. Forman, Steven L. Gerard, George Jamieson, Charles A. Koppelman, Lewis  
 5 Kramer, and David F. Levi (the “Individual Defendants,” together with LVSC, the “Defendants”),  
 6 by and through their undersigned counsel, hereby stipulate as follows:

7 WHEREAS, on December 28, 2020, Plaintiff filed this stockholder derivative action on  
 8 behalf of Nominal Defendant LVSC alleging violations of the federal securities laws and breaches  
 9 of fiduciary duty (the “Derivative Action”);

10 WHEREAS, in his Complaint, Plaintiff alleges, among other things, that the Individual  
 11 Defendants breached their fiduciary duties by making and/or causing LVSC to make false and  
 12 misleading statements, and by causing and/or allowing conduct that was the subject of the alleged  
 13 misstatements, and thereby subjected LVSC to damages, including potential liability in a putative  
 14 class action filed a few months earlier, *The Daniels Family 2001 Revocable Trust v. Las Vegas*  
 15 *Sands Corp.*, Case No. 2:20-cv-01958 (D. Nev.) (the “Securities Action”), which involved  
 16 allegations substantially similar to those made in the Derivative Action;

17 WHEREAS, on February 23, 2021, the parties to the Derivative Action filed a joint  
 18 stipulation to stay the Derivative Action (including all discovery) until 30 days after the final  
 19 resolution of the motion to dismiss in the Securities Action (ECF No. 12);

20 WHEREAS, on February 24, 2021, Judge Gordon granted the joint stipulation and stayed  
 21 the Derivative Action (ECF No. 14);

22 WHEREAS, on March 28, 2022, the motion to dismiss the amended complaint in the  
 23 Securities Action was granted in its entirety (ECF No. 74), and plaintiffs in the Securities Action  
 24 filed a second amended complaint on April 18, 2022 (ECF No. 77);

25 WHEREAS, on August 7, 2023, the motion to dismiss the second amended complaint in  
 26 the Securities Action was granted in part and denied in part (ECF No. 108), and defendants in the  
 27 Securities Action moved for partial reconsideration on August 22, 2023 (ECF No. 109);  
 28

WHEREAS, on January 2, 2024, the court issued an amended order, dismissing the second amended complaint in the Securities Action in its entirety (ECF No. 147);

WHEREAS, on February 26, 2024, the Securities Action was dismissed with prejudice (ECF No. 152), and final judgment was entered on February 27, 2024 (ECF No. 153);

WHEREAS, on February 27, 2024, the Court lifted the stay in this Derivative Action and ordered the parties to meet and confer and submit a proposed scheduling order by March 12, 2024 (ECF No. 33);

WHEREAS, the deadline for plaintiffs in the Securities Action to file a notice of appeal of the final judgment is March 28, 2024;

WHEREAS, the parties in this Derivative Action believe that, before submitting a proposed scheduling order, it would be helpful to know whether an appeal will be taken in the Securities Action;

WHEREFORE, the parties in this Derivative Action have met and conferred and, through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an order as follows:

1. The parties' deadline to submit a proposed scheduling order is extended to April 11, 2024, which is 14 days after the deadline for plaintiffs in the Securities Action to file a notice of appeal.

**IT IS SO STIPULATED.**

Dated: March 8, 2024

**LEVERTY & ASSOCIATES LAW  
CHTD.**

**SNELL & WILMER, L.L.P.**

By: /s/ Patrick R. Leverty

By: /s/ Patrick G. Byrne

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**ORDER**

IT IS HEREBY ORDERED that the parties' stipulation to extend the deadline to submit a proposed scheduling order [ECF No. 34] is GRANTED, nunc pro tunc, and the deadline is extended to April 11, 2024.

Dated: March 13, 2024

  
\_\_\_\_\_  
Honorable Cristina D. Silva  
United States District Judge

Snell & Wilmer

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